

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTSFILED  
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| UNITED STATES OF AMERICA   | ) | U.S. DISTRICT COURT<br>CRIMINAL NO. 05-CR-10102-JLT OF MASS. |
| )                          |   |  |
| )                          |   |  |
| v.                         | ) |  |
| )                          | ) |  |
| JOHN BRUENS, MARY STEWART, | ) |  |
| MELISSA VAUGHN AND         | ) |  |
| MARK SIROCKMAN,            | ) |  |
| )                          | ) |  |
| Defendants.                | ) |  |

**MOTION TO UNSEAL**

Pursuant to Local Rule 7.2, the United States of America, through the undersigned Assistant U.S. Attorney, moves this honorable Court to unseal the following documents:

1. United States' Ex Parte Motion for Protective Order Regarding Relators' Share Negotiations filed June 14, 2005;
2. The Court's Order regarding the above-referenced motion, dated June 17, 2005;

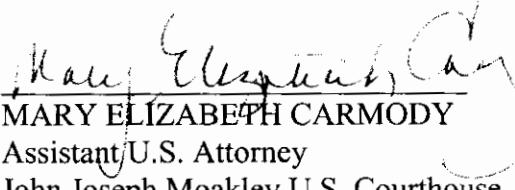
As grounds for the motion, the government states that as of October 17, 2005, the seal was partially lifted in the related civil actions *United States ex rel. Driscoll v. Serono, Inc. et al.*, C.A. No. 00-CV-11680-GAO (D. Mass.); *United States ex rel. Frank Garcia v. Serono, Inc.*, C.A. No. 03-CV-11892-GAO (D. Mass.); *United States ex rel. Boucher, et al. v. Serono Laboratories, Inc., et al.*, C.A. No. 05-CV-10722 (RWZ)(D. Mass.)(All Under Seal)(the "Civil Actions"), and that on October 17, 2005, the civil actions were settled and the settlement made public in redacted form, revealing the identities of the relators in these actions. Accordingly, there is no further need for confidentiality regarding the promises, rewards or inducements made to the relators, Christine Driscoll, Frank Garcia, Kimberly Jackson, Sandra Boucher and William Frye.

As the settlement has been concluded and the seals were lifted in part and the Complaints were redacted, these documents in their redacted form can now be disclosed to the defendants in this case.

Respectfully submitted,

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United States Attorney

By:

  
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DATED: October 24, 2005